I am a 32 year old Extra class licensee. I operate all three modes in question: analog SSB phone; Morse Code; the digital majority modes (teletype using RTTY and PSK31) I have been an amateur for 17 years and am a Phi Beta Kappa college graduate in Political Science and History, with extensive Windows and Macintosh experience and stints as a college teaching assistant. I have completed all of the ARRL emergency training classes and many FEMA classes as well.

First, I'd like to address the Commission's largely internet based methodology of collecting comments in this and all matters. I hope (but doubt) the existence of each submitter is verified other than by IP address, which amounts to nothing at all. That being said, insofar as the notion of perjury is currently a shambles in the United States as proven by previous politics, how can the American taxpayer and voter be certain the commentator exists or even made the claimed comments using this system which has no challenge and response system ? Even ULS / CORES ultimately requires the successful delivery of a paper license to a legal address. How can the Commission assume the identity of a commentator in an era of electronic fraud ?

Second, the FCC has long held the mistaken notion created by the ARRL (of which I have been a member for 18 years since before I was licensed) that :

"We are not persuaded that it is in the public interest to require examinees to demonstrate an ability to exchange messages in one particular communications technology when the Amateur Service rules do not require operators to use this technology and when the trend in amateur communications is to use voice and digital technologies"

The Commission has clearly not spent a single minute listening to the Amateur Service itself. Additionally, like its previous Amateur proceedings, the Commission has chosen to address this matter at the bottom of the sunspot cycle and in the summer, when activity is down generally.

So while it might not be in the public interest to have fewer amateurs, there is no trend in operating of any sort. I find dozens of CW and phone conversations at any given moment. Sometimes I hear no teletype. And the notion of digital phone is an abject falsehood, if the Commission has been led to believe that it exists in any form other than that comparable to terrestrial IBOC ! There are stations experimenting, limited in number, and few listeners because of the little consumer equipment at this time.

Removing the already very basic Morse test will not change this fact in the Amateur Service either !

There are as many CW conversations in progress at any minute as there are voice, and the ARRL's repeated published chants of amateur digital progress (keyboard to keyboard teletype) are a sham except on contest weekends. There are certainly more modes available in the form of teletype

software, but the bulk of the ARRL's own DXCC awards and contest entries are on Phone, followed by CW, then a tiny minority of teletype operators. This is the best indication of active and skilled operators along with the emergency uses of Phone and these same keyboard to keyboard digital modes. That is who should be listened to, not paper Amateurs with fleeting interest in this matter; if I comment on IBOC will I be listened to or NAB and IEEE ? CQ magazine digital contest results and awards, are outnumbered several fold by analog phone and CW, as well.

And as far as general conversations, they certainly are outnumbered by Phone and CW. So set aside the digital fantasy the Commission has been led to believe and therefore declare as fact.

Third, as far as the claim of Morse's uselessness or antiquity that are endlessly levied, the Commission needs to refer to this video story from the U.S. Navy from March 7, 2005:

> Navy/Marine Corps News For The Week of Feb. 26- March 5, 2005
> Story Number: NNS050303-08
> Release Date: 3/3/2005 2:11:00 PM
>
> From the Navy News Service
>
> WASHINGTON (NNS) -- Navy/Marine Corps News For The Week of Feb. 26-March 5, 2005.
> ...
>
> - Morse code is an effective way for the Marine Corps and Navy to communicate.

with video found here:

http://www.news.navy.mil/management/videodb/player/video.aspx?ID=4366

http://www.news.navy.mil/management/videodb/player/video.aspx?ID=4385

The repeated declarations of the demise of Morse are false. It is truly not efficient to use Morse in a business setting as has been said before. But the Amateur Service is not a business. And as regards the U.S. Navy and Marine Corps of 2005, the ARRL, Commssion and commentators would be hard pressed top explain this.

In conclusion, if the Commission and ARRL are so worried about Homeland and National Security, why are the facts being ignored ? I'm not positing that we are going to have rows of hams in a disaster choosing Morse code over Phone. But if the Commission, as it has in every other proceeding, is concerned about upholding the pool of qualifed technical persons of all sorts, it

certainly has missed the boat with this resurgence of US Navy and Marine training !

If the Commission's goal is simply more Amateurs, so be it. If the Commission's goal is a pool of people of all sorts s it has claimed for years right until this proceeding by claiming exclusion of some due to Morse testing, complete removal of the Morse Code test destroys the balance of the pool the Commission claims it is trying to enhance.

Matthew J. Cassarino